DOT-SP 21531
(SECOND REVISION)

EXPIRATION DATE: 2027-06-30

(FOR RENEWAL, SEE 49 CFR 107.109)

1. **GRANTEE:** Environmental Restoration, L.L.C.
   Fenton, MO

2. **PURPOSE AND LIMITATIONS:**
   a. This special permit authorizes the transportation in commerce of damaged or defective lithium ion batteries and lithium ion batteries contained in equipment for the purpose of disposal, recycling, or failure analysis. This special permit provides no relief from the Hazardous Materials Regulations (HMR) other than as specifically stated herein. The most recent revision supersedes all previous revisions.
   b. The safety analyses performed in the development of this special permit only considered the hazards and risks associated with the transportation in commerce.
   c. No party status will be granted to this special permit.

3. **REGULATORY SYSTEM AFFECTED:** 49 CFR Parts 106, 107 and 171-180.

4. **REGULATIONS FROM WHICH EXEMPTED:** 49 CFR § 173.185(f) in that alternative packaging is authorized.

5. **BASIS:** This special permit is based on the application of Environmental Restoration, L.L.C. dated June 28, 2023, submitted in accordance with § 107.109.

Tracking Number: 2023065260
6. **HAZARDOUS MATERIALS (49 CFR 172.101):**

<table>
<thead>
<tr>
<th>Proper Shipping Name</th>
<th>Hazard Class/Division</th>
<th>Identification Number</th>
<th>Packing Group</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lithium ion batteries <em>including lithium ion polymer batteries</em></td>
<td>9</td>
<td>UN3480</td>
<td>N/A</td>
</tr>
<tr>
<td>Lithium ion batteries contained in equipment <em>including lithium ion polymer batteries</em></td>
<td>9</td>
<td>UN3481</td>
<td>N/A</td>
</tr>
</tbody>
</table>

7. **SAFETY CONTROL MEASURES:**

   a. **PACKAGING:** Prescribed packaging must be vented, lined metal drums (55, 30, 20, and 16 gallons) as described in the Environmental Restoration, LLC’s application dated February 27, 2023, which is on file with the Office of Hazardous Materials Safety (OHMS). Packaging is as follows:

   1. The inner shell of each drum must be lined with lining specified in the application dated February 27, 2023, on file with OHMS to prevent potential short-circuiting between the damaged/defective batteries and the metal shell of the drum and to allow filtration of heat, toxic smoke, and fumes through the granular fire suppressant material (referred to as granular material hereafter in lieu of the trade name provided in the February 27, 2023, application, which is on file with OHMS), a noncombustible, electrically non-conductive absorbent.

   2. Each drum must have at the bottom of the drum approximately 3 inches of granular material.

   3. Alternating layers of damaged/defective batteries and granular material must be placed in the drum with a minimum of two (2) inch space between each layer of battery and granular material and with adequate space between each battery, ensuring that all voids are filled.

   4. Prior to closing the drum, approximately 3 inches of the granular material must be loose-filled over the last layer of battery at the top of each drum.

   5. The top of each drum must be securely closed to ensure that no materials will be ejected from the drum during transportation.
(6) Each drum is limited to not more than 180 pounds (82 kg) net weight of damaged/defective batteries.

(7) Each drum must meet the Packing Group I performance level.

(8) Each vehicle may contain not more than ninety six (96) drums.

b. OPERATIONAL CONTROLS:

(1) The batteries packaged for transport are damaged/defective lithium ion batteries that are fire-damaged as a result of incidents in transport or storage or have been identified as defective.

(2) The damaged/defective batteries after completion of packaging in the drum but prior to closing the drum must be held and monitored for venting, leakage, heat, smoke, fire or other adverse reactions for 72 hours prior to being offered for transportation.

(3) The packaged drums must be transported in dedicated vehicles with no other hazardous materials on board and each shipment must be transported directly to a battery disposal or recycling facility or a location for failure analysis.

(4) The drivers must be briefed on the safety issues associated with the damaged/defective batteries.

c. MARKING: Each package (drum) covered under the terms of this special permit must be durably and legibly marked and displayed on a background of contrasting color with the following:

(1) “DOT-SP 21531”.

(2) The marking specified in § 173.185(f)(4).

(3) An emergency response telephone number in case of damage to the packaging or contents.

8. SPECIAL PROVISIONS:

a. Under the terms of this special permit, the grantee may only offer hazardous materials (i.e., the grantee is not authorized as a carrier).
b. A person who is not a holder of this special permit who receives a package covered by this special permit, may reoffer it for transportation provided no modification or change is made to the package and it is offered for transportation in conformance with this special permit and the HMR.

c. A current copy of this special permit must be maintained at each facility where the package is offered or reoffered for transportation.

9. MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle.

10. MODAL REQUIREMENTS: A current copy of this special permit must be carried aboard each motor vehicle used to transport packages covered by this special permit.

11. COMPLIANCE: Failure by a person to comply with any of the following may result in suspension or revocation of this special permit and penalties prescribed by the Federal hazardous materials transportation law, 49 U.S.C. 5101 et seq:

   o All terms and conditions prescribed in this special permit and the Hazardous Materials Regulations, 49 CFR Parts 171-180.

   o Persons operating under the terms of this special permit must comply with the security plan requirement in Subpart I of Part 172 of the HMR, when applicable.

   o Registration required by § 107.601 et seq., when applicable.

Each "Hazmat employee", as defined in § 171.8, who performs a function subject to this special permit must receive training on the requirements and conditions of this special permit in addition to the training required by §§ 172.700 through 172.704.

No person may use or apply this special permit, including display of its number, when this special permit has expired or is otherwise no longer in effect.

Under Title VII of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) — “The Hazardous Materials Safety and Security Reauthorization Act of 2005” (Pub. L. 109-59), 119 Stat. 1144 (August 10, 2005), amended the Federal hazardous materials transportation law by changing the term “exemption” to “special permit” and authorizes a special permit to be granted up to two years for new special permits and up to four years for renewals.

12. REPORTING REQUIREMENTS: Shipments or operations conducted under this special permit are subject to the Hazardous Materials Incident Reporting requirements specified in 49 CFR §§ 171.15 - Immediate notice of certain hazardous materials incidents, and 171.16 - Detailed hazardous materials incident reports. In addition, the grantee(s) of this
special permit must notify the Associate Administrator for Hazardous Materials Safety, in writing, of any incident involving a package, shipment or operation conducted under terms of this special permit.

Issued in Washington, D.C.:

[Signature]

for William Schoonover
Associate Administrator for Hazardous Materials Safety


Copies of this special permit may be obtained by accessing the Hazardous Materials Safety Homepage at https://www.phmsa.dot.gov/approvals-and-permits/hazmat/special-permits-search. Photo reproductions and legible reductions of this special permit are permitted. Any alteration of this special permit is prohibited.

PO: Jephthah Nti